

17-201407

McCABE, WEISBERG & CONWAY, P.C.

By: Marisa M. Cohen, Esq., (Atty. I.D. # MMC87830)

216 Haddon Avenue, Suite 201

Westmont, NJ 08108

(856) 858-7080

Attorneys for Movant: Citizens Bank of Pennsylvania

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Camden Vicinage**

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IN RE: Angelina Redding

Case No.: 17-20852-JNP

Debtor/Respondent

Chapter: 13

John G Redding

Co-Debtor/Respondent

Judge: Jerrold N. Poslusny Jr.

NOTICE OF MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY

TO:

Angelina Redding  
315 W. Wildwood Ave  
Wildwood, New Jersey 08260

Brad J. Sadek  
Sadek and Cooper  
1315 Walnut Street  
Ste 502  
Philadelphia, Pennsylvania 19107

Isabel C. Balboa, Trustee  
Chapter 13 Standing Trustee  
Cherry Tree Corporate Center  
535 Route 38 - Suite 580  
Cherry Hill, New Jersey 08002

John G Redding  
315 West Wildwood Avenue  
Wildwood , New Jersey 08260

DEAR SIRS AND MADAMS:

PLEASE TAKE NOTICE that on November 19, 2019 at 10:00 a.m. or as soon as counsel may be heard, the undersigned attorney for the secured creditor, **Citizens Bank of Pennsylvania**, will move before the United States Bankruptcy Court, District of New Jersey, for an Order Vacating the Automatic Stay with respect to property known as 315 West Wildwood Avenue, Wildwood, New Jersey 08260, to commence or continue its foreclosure action, by reason of the failure of the Debtor to make regular monthly mortgage payments outside his/her Chapter 13 Plan.

PLEASE TAKE FURTHER NOTICE that if you wish to contest this motion, you must file a written response with the Clerk of the Bankruptcy Court and serve a copy of the responding papers upon the undersigned at least seven (7) days before the date of the hearing.

PLEASE TAKE FURTHER NOTICE that the moving party avers that no brief is necessary as the matter does not involve complex legal issues.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby waives oral argument and relies upon the Certifications in support of this motion unless the matter is contested.

Date: October 24, 2019

McCABE, WEISBERG & CONWAY, LLC

/s/ Marisa M. Cohen  
Marisa M. Cohen, Esquire